

Message

From: Febbo, Carol [febbo.carol@epa.gov]
Sent: 9/3/2020 3:42:50 PM
To: Fernandez, Cristina [Fernandez.Cristina@epa.gov]
Subject: Re: Question Regarding the EPA OIG Ethylene Oxide Management Alert Report

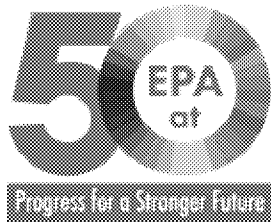
They communicate with the deputies I'm assuming.

Carol A. Febbo, M.S.
Deputy Director
Air and Radiation Division
U.S. EPA - Region 3
Philadelphia, PA 19103
Office #: 215-814-2076
EPA Cell #: 215-375-0848

On Sep 3, 2020, at 11:37 AM, Fernandez, Cristina <Fernandez.Cristina@epa.gov> wrote:

I am not sure what this means and why is she writing to you and not including me. We'll talk later.

Cristina Fernandez, Director
Air & Radiation Division (3AD00)
U. S. Environmental Protection Agency, Region 3
1650 Arch Street
Philadelphia, PA 19103-2023
Work: (215) 814-2178
Cell: (215) 375-0847



From: Febbo, Carol <febbo.carol@epa.gov>
Sent: Thursday, September 03, 2020 11:35 AM
To: Fernandez, Cristina <Fernandez.Cristina@epa.gov>
Subject: Fwd: Question Regarding the EPA OIG Ethylene Oxide Management Alert Report

I will tend to this when I get back home.

Carol A. Febbo, M.S.
Deputy Director
Air and Radiation Division
U.S. EPA - Region 3
Philadelphia, PA 19103
Office #: 215-814-2076

Begin forwarded message:

From: "Fleury, Lorraine" <FLEURY.LORRAINE@EPA.GOV>
Date: September 3, 2020 at 10:04:48 AM EDT
To: "Febbo, Carol" <febbo.carol@epa.gov>
Cc: "Burch, Alfred" <Burch.Alfred@epa.gov>, "Vaidya, Dharmik" <Vaidya.Dharmik@epa.gov>, "Chow, Alice" <chow.alice@epa.gov>
Subject: Question Regarding the EPA OIG Ethylene Oxide Management Alert Report

Hi Carol – Sorry to bother you again regarding this OIG report but I wanted to be sure that Diana is aware of the review since 4 Region 3 facilities are included. The subject audit was issued in March of 2020 and focused on 25 high-priority ethylene oxide emitting facilities, 4 of which are in Region 3. The OIG has not accepted the Agency's corrective action regarding plans to notify the public after additional research is complete. The OIG will submit a dispute resolution request to the EPA Chief Financial Officer for a decision. Also, Region 3 received emails from the OIG auditors this week requesting an update on whether state and local agencies have held public outreach to residents living near the four ethylene oxide facilities in EPA Region 3 (below).

Yesterday Diana sent an email requesting that the front office be aware of all communication with the OIG and GAO auditors and since this report is not listed on the monthly report I wanted to be sure she is aware of the status.

Let me know if you have questions or need more informations.

Lorraine (Lori) Fleury, Audit Liaison
US Environmental Protection Agency – Region 3
Mission Support Division - Financial Management Branch
Phone: 215-814-2341

From: Fernandez, Cristina <Fernandez.Cristina@epa.gov>
Sent: Tuesday, September 01, 2020 12:53 PM
To: McGhee-Lenart, Renee <McGhee-Lenart.Renee@epa.gov>
Cc: Chow, Alice <chow.alice@epa.gov>; Nitsch, Chad <Nitsch.Chad@epa.gov>; Fleury, Lorraine <FLEURY.LORRAINE@EPA.GOV>; Febbo, Carol <febbo.carol@epa.gov>
Subject: RE: Question Regarding the EPA OIG Ethylene Oxide Management Alert Report

Hi Renee,

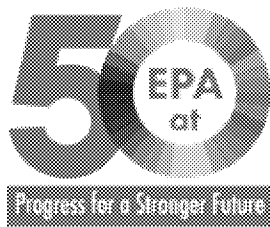
It is my understanding that our states have not, although there is interest. We have talked to our states and local agencies about doing public outreach and have offered our assistance.

We are starting to explore the option of doing public outreach using a virtual platform, but are not there yet.

Thanks, Cristina

Cristina Fernandez, Director

Air & Radiation Division (3AD00)
U. S. Environmental Protection Agency, Region 3
1650 Arch Street
Philadelphia, PA 19103-2023
Work: (215) 814-2178
Cell: (215) 375-0847



From: McGhee-Lenart, Renee <McGhee-Lenart.Renee@epa.gov>
Sent: Tuesday, September 01, 2020 12:48 PM
To: Fernandez, Cristina <Fernandez.Cristina@epa.gov>
Cc: Chow, Alice <chow.alice@epa.gov>; Nitsch, Chad <Nitsch.Chad@epa.gov>; Fleury, Lorraine <FLEURY.LORRAINE@EPA.GOV>; Febbo, Carol <febbo.carol@epa.gov>
Subject: RE: Question Regarding the EPA OIG Ethylene Oxide Management Alert Report

Cristina,

Thank you for response. Have your states or local agencies conducted public outreach to the residents living near any of the four facilities?

Kind regards,
Renee McGhee-Lenart

*Renee McGhee-Lenart
Acting Aider Director
EPA Office of Inspector General
11201 Renner Blvd.
Lenexa, KS 66219
(913) 551-7534*

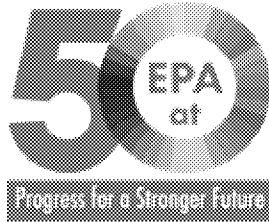
From: Fernandez, Cristina <Fernandez.Cristina@epa.gov>
Sent: Tuesday, September 1, 2020 11:41 AM
To: McGhee-Lenart, Renee <McGhee-Lenart.Renee@epa.gov>
Cc: Chow, Alice <chow.alice@epa.gov>; Nitsch, Chad <Nitsch.Chad@epa.gov>; Fleury, Lorraine <FLEURY.LORRAINE@EPA.GOV>; Febbo, Carol <febbo.carol@epa.gov>
Subject: RE: Question Regarding the EPA OIG Ethylene Oxide Management Alert Report

Hi Renee,

At this point, we have continued to work with out states and local agencies, but we have not done any public outreach.

Thanks, Cristina

Cristina Fernandez, Director
Air & Radiation Division (3AD00)
U. S. Environmental Protection Agency, Region 3
1650 Arch Street
Philadelphia, PA 19103-2023
Work: (215) 814-2178
Cell: (215) 375-0847



From: McGhee-Lenart, Renee <McGhee-Lenart.Renee@epa.gov>
Sent: Monday, August 31, 2020 10:59 AM
To: Fernandez, Cristina <Fernandez.Cristina@epa.gov>; Arnold, David <arnold.david@epa.gov>
Cc: Chow, Alice <chow.alice@epa.gov>; Nitsch, Chad <Nitsch.Chad@epa.gov>; Fleury, Lorraine <FLEURY.LORRAINE@EPA.GOV>
Subject: Question Regarding the EPA OIG Ethylene Oxide Management Alert Report

Cristine,

I wanted to follow up on whether any public outreach has taken place for the residents living near the four ethylene oxide facilities in EPA Region 3.

- **Nonresponsive based on revised scope**
- Union Carbide Corp. – Institute Institute, WV
- **Nonresponsive based on revised scope**
- Union Carbide Corp. –South Charleston, WV Chemical plant

When we last communicated, no outreach had been scheduled. I understand that due to the pandemic, outreach may have been delayed.

Thank you for your assistance.

Renee McGhee-Lenart

*Renee McGhee-Lenart
Acting Air Director
EPA Office of Inspector General
11201 Renner Blvd.
Lenexa, KS 66219
(913) 551-7534*

From: Arnold, David <arnold.david@epa.gov>
Sent: Thursday, December 19, 2019 8:58 AM
To: McGhee-Lenart, Renee <McGhee-Lenart.Renee@epa.gov>
Cc: Chow, Alice <chow.alice@epa.gov>; Nitsch, Chad <Nitsch.Chad@epa.gov>; Fleury,

Lorraine <FLEURY.LORRAINE@EPA.GOV>; Fernandez, Cristina
<Fernandez.Cristina@epa.gov>

Subject: RE: EPA OIG Air Toxics RTR/Congressional Request Audit -- Updating the OIG
Ethylene Oxide Management Alert Report

Hi Renee,

At this point in time, Region 3 has not scheduled meetings with city councils, scheduled door-to-doors in certain communities, or scheduled any other public meeting with residents that will take place in the next six months. As noted in the Communications Plan, this is a living document used to guide our communication efforts.

Let me know if you have any other questions.

David L. Arnold
Deputy Director
Air & Radiation Division
US EPA - Region 3
1650 Arch Street
215-814-2172

From: McGhee-Lenart, Renee
Sent: Wednesday, December 18, 2019 4:26 PM
To: Fernandez, Cristina <Fernandez.Cristina@epa.gov>; Arnold, David
<arnold.david@epa.gov>
Cc: Chow, Alice <chow.alice@epa.gov>; Nitsch, Chad <Nitsch.Chad@epa.gov>; Fleury,
Lorraine <FLEURY.LORRAINE@EPA.GOV>
Subject: FW: EPA OIG Air Toxics RTR/Congressional Request Audit -- Updating the OIG
Ethylene Oxide Management Alert Report

Cristina,

We have a follow-up question about the Region 3 Ethylene Oxide Communication plan.

Has Region 3 scheduled any meetings with city councils, scheduled door-to-doors in certain communities, or scheduled any other public meeting with residents that will take place in the next six months?

(January to June 2020). We are revising our final report and want to include any meetings that have been scheduled.

Thank you for your help.

Renee McGhee-Lenart

*Renee McGhee-Lenart
EPA Office of Inspector General
11201 Renner Blvd.*

LENEXA, KS 66219
(913) 551-7534

PHASE II Initial Outreach/Increase

Awareness

(January 2020 – June 2020)

- **Program actions:** Region 3 to provide assistance as needed to state and local partners as we continue to work down the remaining EtO facilities, while adding more as we find them. We expect that with information learned from Phase I, Second tier facilities should have a more in depth look to confirm that they are indeed a lower risk or determine if their risks have increased. Provide info to S/L. Bring in OAQPS if needed for technical meetings. ECAD will strategize opportunities to identify EtO non-reporters and work with S/Ls enforcement/permit groups.
- **Corresponding communications:** Continue dialog with state and local partners on how they want to inform the local communities. The message to be shared will depend on how the S/L plans to work with their facilities; how the facilities respond; and if there are some ways to reduce exposures.

Proposed actions during this phase:

- *Develop key messages most appropriate for Phase II*
- *Intergovernmental outreach*
- *City council meetings*
- *Door-to-doors (TBD)*
- *Program activities will drive communications activities; TBD based on Phase 1.*

From: Fernandez, Cristina <Fernandez.Cristina@epa.gov>

Sent: Monday, August 12, 2019 11:41 AM

To: McGhee-Lenart, Renee <McGhee-Lenart.Renee@epa.gov>

Cc: Chow, Alice <chow.alice@epa.gov>; Nitsch, Chad <Nitsch.Chad@epa.gov>; Fleury, Lorraine <FLEURY.LORRAINE@EPA.GOV>; Chuong, Bao <Chuong.Bao@epa.gov>

Subject: RE: EPA OIG Air Toxics RTR/Congressional Request Audit -- Request for Information by August 12th

Attached please find our response to your request.

Please, let me know if you have any questions.

Thanks, Cristina

Cristina Fernandez, Director
Air & Radiation Division (3AD00)
U. S. Environmental Protection Agency, Region 3
1650 Arch Street
Philadelphia, PA 19103-2023
Work: (215) 814-2178
Cell: (215) 375-0847

From: McGhee-Lenart, Renee <McGhee-Lenart.Renee@epa.gov>

Sent: Sunday, August 04, 2019 5:35 PM

To: Fernandez, Cristina <Fernandez.Cristina@epa.gov>

Cc: Chow, Alice <chow.alice@epa.gov>; Nitsch, Chad <Nitsch.Chad@epa.gov>; Fleury, Lorraine <FLEURY.LORRAINE@EPA.GOV>; Chuong, Bao <Chuong.Bao@epa.gov>

Subject: EPA OIG Air Toxics RTR/Congressional Request Audit -- Request for Information by August 12th

Cristina,

As you may be aware, EPA-OIG is currently conducting an audit of the agency's air toxics Risk and Technology Review (RTR) process. The notification memo is attached. We have expanded our scope to address recent Congressional requests related to ethylene oxide emissions and risk communication. We understand that the following facilities in Region 3 contribute to elevated cancer risks at the census tract and/or census block level based on modeling conducted by the Office of Air Quality Planning and Standards (OAQPS) to develop the 2014 NATA:

- **Nonresponsive based on revised scope**
- Union Carbide Corp. – South Charleston Facility (South Charleston, WV)
- Union Carbide Corp. – Institute (Institute, WV)
- **Nonresponsive based on revised scope**

As part of our audit, please provide the following by COB August 12, 2019:

- Any communications plan drafted or finalized as of August 2, 2019 to communicate to the public in Region 3 about elevated cancer risks from ethylene oxide emissions, and
- A response to the following questions:
 - Since the release of the 2014 NATA to the public on August 22, 2018, what outreach (e.g., public meetings, webinars, etc.) has Region 3 conducted to inform residents about the elevated cancer risks as a result of ethylene oxide emissions from the above four facilities? If so, please provide the:
 - type of outreach (e.g., public meetings, webinars, etc.) conducted for these residents,
 - date of each outreach,
 - location of each outreach if applicable, and
 - outreach documentation (e.g., sign-in sheets, meeting agenda, briefing materials, etc.).
 - Since the release of the 2014 NATA to the public on August 22, 2018, what outreach (e.g., face-to-face meeting, conference call, etc.) has Region 3 conducted to inform elected officials about the elevated cancer risk of their constituents as a result of ethylene oxide emissions from the above four facilities? If so, please provide the:
 - type of outreach (e.g., face-to-face meeting, conference call, etc.) conducted for these elected officials,
 - date of each outreach,
 - location of each outreach if applicable, and
 - outreach documentation (e.g., sign-in sheets, meeting agenda, briefing materials, etc.).

If there are additional facilities contributing to elevated cancer risks that Region 3 has independently modeled or modeled with assistance from OAQPS, please also provide the name and location of the facilities and information on any outreach (i.e., type of outreach, date of each outreach, location of outreach if applicable, and outreach documentation) conducted by Region 3 for residents and elected officials by COB August 12, 2019.

Thank you for your assistance. Please let me know if you have any questions.

Renee McGhee-Lenart

*Renee McGhee-Lenart
EPA Office of Inspector General
11201 Renner Blvd.
Lenexa, KS 66219
(913) 661-7534*